

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRIAN JONES,

Plaintiff,

v.

THE URBAN LEAGUE OF
SPRINGFIELD, INC. and
CAMP ATWATER,

Defendants.

DOCKET NO. 04-cv-30215-KPN

**PLAINTIFF'S MOTION FOR A PROTECTIVE ORDER
and
REQUEST FOR ORAL ARGUMENT**

The Plaintiff respectfully moves this Court for a protective order pursuant to Fed.R.Civ.P. 26(c). In particular, the Plaintiff seeks an order quashing the Notice of Taking Deposition on the Keeper of Records, Roger L. Putnam Vocational Technical High School As grounds for this motion, Plaintiffs relies on the reasons set forth in Memorandum of Law submitted herewith.

Respectfully submitted,
PLAINTIFF
By his Attorney,

Dated: October 21, 2005

/s/ Suzanne Garrow
Suzanne Garrow
BBO # 636548
Heisler, Feldman & McCormick, P.C.
1145 Main Street, Suite 508
Springfield, MA 01103
(413) 788-7988

REQUEST FOR ORAL ARGUMENT

Plaintiff hereby requests oral argument on the above motion pursuant to Local Rule 7.1(D).

Respectfully submitted,
PLAINTIFF
By his Attorney,

Dated: October 21, 2005

/s/ Suzanne Garrow
Suzanne Garrow
BBO # 636548
Heisler, Feldman & McCormick, P.C.
1145 Main Street, Suite 508
Springfield, MA 01103
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CERTIFICATE OF SERVICE

I, hereby certify that the foregoing Motion was served upon the attorney of record for the defendants by electronic mail on this date.

/s/Suzanne Garrow
Suzanne Garrow

CERTIFICATION OF COMPLIANCE WITH Fed.R.Civ.P. 26(c) AND LOCAL RULE 7.1

I, hereby certify that I conferred on several occasions with counsel for the Defendants in a good faith effort to resolve this discovery dispute without court action.

/s/ Suzanne Garrow
Suzanne Garrow